

cc: Brent Gilhousen

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CH2M HILL

## **TECHNICAL STATUS REPORT**

**PREPARED FOR:** Tom Post/EPA Region 10

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**COPIES:** Byung Maeng/Ecology NWRO

**DATE:** March 10, 1994

**SUBJECT:** Rhône-Poulenc Monthly Status Report

**SITE NAME AND  
LOCATION:** Rhône-Poulenc, Inc./Seattle Plant  
Tukwila, WA

**REPORTING  
PERIOD:** February 1 through February 28, 1994

**PROJECT:** SEA35051.A1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RPI) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

### **Progress Made This Reporting Period**

#### ***Task A2-Applicable Permits***

On February 7, 1994 RPI submitted a letter to U.S. EPA (Post) and Ecology (Llewelyn) concerning the identification of a NPDES permit writer for facility stormwater and remediation discharges. In response, Tom Post coordinated with Robert Warren of Ecology's Water Quality Program. Mr. Warren notified RPI and CH2M HILL his office will handle NPDES related issues for the Marginal Way Facility.

On February 8, CH2M HILL (O'Flaherty) attended a workshop and public hearing sponsored by Ecology on the proposed 1994 NPDES wastewater discharge permit fees in Lacey, Washington. Ecology has proposed an annual fee of \$47,141.00 (flat fee) for RCRA Corrective Action Sites as a new permit category. On February 23, 1994

CH2M HILL prepared a draft letter for RPI to submit to Ecology objecting to this fee as an official public comment.

On February 18, 1994 the Seattle Engineering Department sent a letter to RPI (Liu) identifying specific conditions be met regarding the discharge of groundwater into the city's sewer lines. A letter will be submitted to the city of Seattle indicating that RPI will not discharge groundwater from its facility to a city-owned maintenance hole. All site groundwater discharges are metered and are authorized by Metro.

### ***Task A3--Interim Measures***

The FRH250-SOS-TID automated skimmer manufactured by Clean Environment Equipment was delivered to the Marginal Way Facility on February 22, 1994. Ancillary equipment and supplies including a compressor are being acquired and installed for the skimmer.

On February 14, CH2M HILL prepared an incineration cost estimate comparison for RPI for the LNAPL. ENSCO was contacted by CH2M HILL on February 25, 1994 and was told that they have been selected to dispose of the LNAPL. A waste profile application is being sent by ENSCO to CH2M HILL.

### ***Task A4--RFI Workplan***

On February 16, 1994 CH2M HILL distributed an updated RCRA Corrective schedule for the Marginal Way Facility. The revised schedule (Figure 3-2) and Table 2-2 were submitted to the recipients of the final RCRA Facility Investigation (RFI) Workplan including the Tukwila Public Library and Foster Library located in Tukwila, Washington.

### ***Task A5--RFI Field Investigation***

The 3-week groundwater level monitoring program was extended for an additional week and was completed on February 21. An additional week was instituted to collect more water level and barometric pressure data to evaluate their interrelationship, if any. The four rounds of manual water level measurements were completed on February 4.

Sampling soil from boreholes commenced on February 22. Area 7 was completed. The Hydropunch groundwater investigation started on February 28.

The attached tables summarize the groundwater and soil sampled during the month of February.

RFI analytical results are assembled by the laboratory in groups of up to 20 samples called sample delivery groups (SDGs). The first SDG analytical results were received from ETC by CH2M HILL on February 16, 1994 for 20 soil samples from ETC's SDG Number RPSO1 (see attached Table). These samples are currently undergoing data validation and database entry by CH2M HILL.

### **Deliverables Submitted**

The January Progress Report was submitted to U.S. EPA on February 8, 1994.

Revised RFI schedule and Table 2-2 were submitted to U.S. EPA and RFI Workplan recipients on February 16, 1994.

A letter to U.S. EPA and Ecology requesting an official NPDES contact by RPI on February 7, 1994.

### **Outstanding Issues**

On February 15, CH2M HILL was contacted by ETC about the presence of some high analytes (i.e., toluene and mineral oil) in some groundwater samples from Area A4 and their effect on the overall analyses. Due to high concentrations, the laboratory is not able to meet some of the quality control limits. The lab is following proper procedures per CLP procedures but some data may need to be qualified due to interferences from very high concentrations of some contaminants. When CH2M HILL receives the groundwater SDG, this information will be closely inspected.

### **Activities Planned During Next Reporting Period**

#### ***Task A2-Applicable Permits***

U.S. EPA (Post), RPI (Liu), CH2M HILL (O'Flaherty), and Hays Consulting (Hays) will attend a meeting on March 1, 1994 convened at Ecology's offices in Olympia, Washington to discuss what will be needed in RPI's NPDES permit application and how the fees for this permit will be levied. According to Ecology (Warren) a permit writer will be assigned to RPI for this project.

#### ***Task A3-Interim Measures***

The LNAPL recovery equipment installation will be completed and start-up operations will be initiated.

#### ***Task A5-RFI Field Investigation***

A draft of the results of the literature search for arsenic and PAH contamination within the general vicinity of the facility (both groundwater and soils).

Analytical data from the first round of groundwater and soils sampling will be validated by CH2M HILL as the data are received from ETC.

The groundwater level monitoring data will be evaluated during March.

The hydropunch investigation and soil borehole sampling will be completed in March. Sediment samples will be collected on March 3 when the tides are most favorable for nearshore access.

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